

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SARAH PALIN, : X  
Plaintiff, :  
: :  
: :  
: :  
: :  
-against- : No. 1:17-cv-04853-JSR  
: :  
: :  
: :  
THE NEW YORK TIMES COMPANY and JAMES :  
BENNET, :  
Defendants. :  
: :  
: :  
----- X

**NOTICE OF MOTION *IN LIMINE*  
TO EXCLUDE EVIDENCE CONCERNING CERTAIN ARTICLES  
PUBLISHED BY THE NEW YORK TIMES IN 2011**

PLEASE TAKE NOTICE that Defendants The New York Times Company (“The Times”) and James Bennet will file a motion requesting that the Court exclude any documentary exhibits, testimony, or other evidence regarding publication by The Times in 2011 of certain articles purportedly wrongfully linking Plaintiff to the shooting in Tucson, Arizona, in which Rep. Gabrielle Giffords was wounded and six others were killed. Defendants have served their papers in support of this motion on March 31, 2025, will file their papers by April 7, 2025, and Plaintiff’s answering papers are due on April 7, 2025. Pursuant to Rule 9 of the Court’s Individual Rules of Practice, in limine motions are normally resolved on the morning of the first day of trial.

Dated: New York, New York  
March 31, 2025

Respectfully submitted,

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